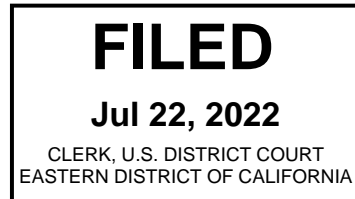


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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN KALANI HATCHIE,

Defendant.

CASE NO. 2:22-cr-0158 TLN

I N F O R M A T I O N

COUNT ONE: [18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography]

The United States Attorney charges: T H A T

JOHN KALANI HATCHIE,
defendant herein, between on or about October 1, 2019, and continuing through on or about July 1, 2021, in the Counties of Yolo, Sacramento, and elsewhere, State and Eastern District of California, knowingly possess at least one matter which contained visual depictions that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which were produced using materials using materials that had been so shipped and transported, by any means including by computer, where the production of such visual depictions involved the use of a minor engaged in sexually explicit conduct as defined in Title 18,

United States Code, Section 2256(2), and such visual depictions were of such conduct as defined in Title 18, United States Code, Section 2256(2), all in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

PRIOR CONVICTION NOTICE

On April 13, 2010, the United States District Court for the Eastern District of California imposed a Judgment and Sentence of 90 months imprisonment and 120 months supervised release on defendant, JOHN KALANI HATCHIE, in case number 2:08-CR-146 for a violation of 18 U.S.C. § 2252(a)(4)(B).

FORFEITURE ALLEGATION: [18 U.S.C. § 2253(a) - Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Count One of this Information, defendant JOHN KALANI HATCHIE, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a), any and all matter which contains visual depictions produced, transported, mailed, shipped or received in violation thereof; any property, real or personal, constituting or traceable to gross profits or other proceeds the defendant obtained as a result of said violations; and any property, real or personal, used or intended to be used to commit and to promote the commission of such violations, or any property traceable to such property, including but not limited to the following:

a. A SanDisk Ultra Plus 128GB MicroSD card;

2. If any property subject to forfeiture as a result of the offense alleged in Count One of this Information, for which defendant is convicted:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United State Code, Section 2253(b),

1 incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of
2 said defendant, up to the value of the property subject to forfeiture.

3 Dated: July 22, 2022

PHILLIP A. TALBERT
United States Attorney

5 By: /s/ ROGER YANG
6 ROGER YANG
Assistant United States Attorney

United States v. John Kalani Hatchie

Penalties for Information

COUNT 1:

VIOLATION: 18 U.S.C. § 2252(a)(4)(B) - Possession of Child Pornography

PENALTIES: Maximum of up to 20 years in prison; or Fine of up to \$250,000; or both fine and imprisonment. Mandatory minimum of 10 years in prison. Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count); \$5,000 JVTA / § 3014 (mandatory if the defendant is3 not found to be indigent); Special assessment, pursuant to 18 U.S.C. § 2259A of no more than \$17,000 if the defendant is not found to be indigent.